

FREDERICK P. FURTH (No. 38438)
MICHAEL P. LEHMANN (No. 77152)
THOMAS P. DOVE (No. 51921)
ALEX C. TURAN (No. 227273)
THE FURTH FIRM LLP
225 Bush Street, 15th Floor
San Francisco, California 94104-4249
Telephone: (415) 433-2070
Facsimile: (415) 982-2076

Attorneys for Plaintiffs Michael Brauch and
Andrew Meimes
(N.D. Cal. Case No. C:05-2743 (BZ))
(Additional Counsel are listed on Signature Page)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DAVID E. LIPTON, et al., on behalf of themselves and all others similarly situated,)	CIVIL ACTION NO. C:05-2669 (MHP)
)	
Plaintiffs,)	DECLARATION OF MICHAEL P.
)	LEHMANN IN SUPPORT OF
vs.)	ADMINISTRATIVE MOTION TO
)	CONSIDER WHETHER CASES
INTEL CORPORATION, a Delaware corporation,)	SHOULD BE RELATED
)	
)	
Defendant.)	
)	

1. I am counsel of record for plaintiffs Michael Brauch and Andrew Meimes in the case of *Brauch v. Intel Corp.*, No. C:05-2743 (BZ) (N.D. Cal., filed July 5, 2005) (“*Brauch*”).

2. I submit this declaration pursuant to Civ. Local Rule 7-11(a) in support of the *Brauch* plaintiffs’ motion to have the *Brauch* case and the cases of *Konieczka v. Intel Corp.*, No. C:05-2700 (MHP) (N.D. Cal., filed June 30, 2005) (“*Konieczka*”); *Prohias v. Intel Corp.*, No. C:05-2699 (JL) (N.D. Cal., filed June 30, 2005) (“*Prohias*”); *Niehaus v. Intel Corp.*, No. C:05-2720 (JCS) (N.D. Cal., filed July 1, 2005) (“*Niehaus*”); *Hamilton v. Intel Corp.*, No. C:05-2721 (JCS) (N.D. Cal., filed July 1, 2005) (“*Hamilton*”); *Baxley v. Intel Corp.*, No. C:05-2758 (EMC) (N.D. Cal., filed July 6, 2005) (“*Baxley*”); and *Lipton v. Intel*

1 Corp., No. C:05-2669 (MHP) (N.D. Cal., filed June 29, 2005) ("*Lipton*") treated as related
2 cases within the meaning of Civ. Local Rule 3-12(a).

3 3. I contacted attorneys at the firm of Hagens Berman Sobol Shapiro LLP, who
4 represent the plaintiffs in the cases other than *Brauch* listed above and they have agreed that
5 these cases should be treated as related cases.

6 4. I have not been able to contact anyone representing Intel Corporation. To
7 the best of my knowledge, no counsel has made an appearance on its behalf in any of these
8 cases.

9 I declare under penalty of perjury under the laws of the United States and the
10 laws of the State of California that the foregoing is true and correct.

11 Executed this 7th day of July, 2005 in San Francisco, California.

12 By: /s/ Michael P. Lehmann
13 Michael P. Lehmann
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